# UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

IN RE:	§	
	§	
ALLAN L. REAGAN,	§	CASE NO. 20-11161-TMD
	§	
Debtor	§	CHAPTER 11

## MOTION FOR EXTENSION OF TIME TO FILE REAFFIRMATION AGREEMENTS

This pleading requests relief that may be adverse to your interests.

If no timely response is filed within 21 days from the date of service, the relief requested herein may be granted without a hearing being held.

A timely filed response is necessary for a hearing to be held.

TO THE HONORABLE TONY M. DAVIS, U.S. BANKRUPTCY JUDGE:

Allan L. Reagan ("**Debtor**") files this Motion for Extension of Time to File Reaffirmation Agreements, as follows:

- 1. The Debtor filed his Voluntary Petition on October 22, 2020. The deadline for filing Reaffirmation Agreements is January 19, 2021.
- 2. The Debtor is currently finalizing his Plan, which should be filed on January 20, 2021.
- 3. In connection with the Debtor's Plan, the Debtor anticipates executing the Reaffirmation Agreement for the vehicle(s) which are property of the Estate. Additional Reaffirmation Agreements may be necessary, as well.
- 4. The Debtor requests an extension of thirty (30) days to file any applicable Reaffirmation Agreement.

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Respectfully submitted,

WALLER LANSDEN DORTCH & DAVIS, LLP

By:/s/ Mark C. Taylor

Mark C. Taylor (Bar No. 19713225) William R. "Trip" Nix (Bar No. 24092902)

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Attorneys for the Debtor and Debtors in Possession

# CERTIFICATE OF SERVICE

The foregoing was served on all persons on the attached Service List electronically via the Court's ECF service or via first class mail on this 19<sup>th</sup> day of January, 2021.

/s/ Mark C. Taylor

Mark C. Taylor

## SERVICE LIST

**Debtor** 

Allan L. Reagan 585 River Run Leander, TX 78641

Trustee

Michael Colvard Weston Center 112 East Pecan Street, Suite 1616 San Antonio, TX 78205

Twenty-largest creditors:

Madison/East Towne LLC c/o CBL & Associates 2030 Hamilton Place Blvd. Chattanooga, TN 37421-6000

Village @ La Orilla Attn: Philip Lindborg 12809 Donette Court N.E. Albuquerque, NM 87112

Martin S. Headley 1500 Knobb Hill Lane Paoli, PA 19301

Comerica Bank Attn: Lesley B. Higginbotham, VP Special Assets Group - Texas Market P.O. Box 650282 Dallas, TX 75265-0282

Ann E. Headley 1500 Knobb Hill Lane Paoli, PA 19301

Wyndham Franchisor LLC 22 Sylvan Way Parssipany, NJ 07054

Spain Family IX LLC c/o Patrick J. Spain 11809 Oak Branch Dr. Austin, TX 78737

Bennett Living Trust Attn: Michael Bennett 2321 Abbot Kinney Blvd. Venice, CA 90291

Gary J. Neumayer 2201 Berrywood Lane Bloomington, IL 61704-2449 Headley Investments, LP 1500 Knobb Hill Lane Paoli, PA 19301

Frances and Wayne Lee 468 Jade Tree Lane Monterey Park, CA 91754

Capital One Spark Visa for Business P.O. Box 30285 Salt Lake City, UT 84130-0285

Chase Ink Card for Business P.O. Box 15298 Wilmington, DE 19850-5298

Ford Motor Credit Corp. P.O. Box 105704 Atlanta, GA 30348

Comerica Bank Dept. #166901 P.O. Box 55000 Detroit, MI 48255-1669

Citicard Advantage Mastercard Cardmember Services P.O. Box 6062 Sioux Falls, SD 57117

Discover Card
Billing Inquiries
P.O. Box 30943
Salt Lake City, UT 84130

Chase Visa Mileage Plus P.O. Box 15298 Wilmington, DE 19850-5298

Comerica Bank Attn: J.B. Stueckler, AVP 300 W. Sixth Street Austin, TX 78701

Unsecured Creditors/ Interested Parties 3401Hoteliers, LP Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681 83<sup>rd</sup> Street Development, LLC Attn: Trent G. Moore 9000 Cameron Parkway Oklahoma City, OK 73114

Action Propane 2601 S. Hwy. 183 Leander, TX 78641

ADT P.O. Box 660418 Dallas, TX 75266

Al Clawson Disposal P.O. Box 416 Jarrel, TX 76537

AT&T P.O. Box 5001 Carol Stream, IL 60197

AT&T (DirectTV) P.O. Box 5014 Carol Stream, IL 60197

Bank of Austin Attn: David H. Marks, SVP 8611 N. Mopac Exp., Suite 101 Austin, TX 78759

DT Chandler, LLC Attn: Bret Anderson, Manager 140 E. Rio Salado Parkway, Unit 305 Tempe, AZ 85281

FB Capital, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse AZ, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse Holdco, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse Indiana, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681 Flix Brewhouse Iowa, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse NM, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse OK, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse SAT, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse III, LLC (Mansfield) Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse Texas IV, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse Texas V, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse TX II, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse TX IV, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse Wi, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Flix Brewhouse, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681 Flix Entertainment, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Hospitality Investors, Inc. Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Internal Revenue Services Centralized Insolvency Office P.O. Box 7346 Philadelphia, PA 19101-7346

Janet L. Reagan 585 River Run Leander, TX 78641

Kathleen R. McCormick 6801 Greenwood Ave., Unit 210 Seattle, WA 98103

Lone Star National Bank Attn: Sergio Gonzalez, 1st VP 2100 Boca Chica Blvd. Brownsville, TX 78520

Merle Hay Investors LLC c/o Abbell Credit Corporation 30 N. LaSalle St., Suite 2120 Chicago, IL 60602

Mikeska Monahan & Peckham, P.C. 100 Congress Ave., Suite 990 Austin, TX 78701

Pedernales Electric Company P.O. Box 1 Johnson City, TX 78636

Poolwerx by Blue Bottom Pool Supply 3021 S. IH35, Suite 140 Round Rock, TX 78664

Prudential Mortgage Capital Company LLC c/o Prudential 100 Mulberry St., Gateway Center 4 8th Floor Newark, NJ 07102

ROP Arteraft LLC Attn: Adam Frank 5678 N. mesa St. El Paso, TX 79912 Round Rock Business Park, LLC Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

RPT Realty, L.P. 19 W. 44<sup>th</sup> Street, Suite 1002 New York, NY 10036

Securian/Minnesota Life Insurance Co. c/o Trinity Real Estate Finance 100 NE Loop 410, Suite 972 San Antonio, TX 78216

Southwestern Retail Properties II, LP Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Southwestern Retail Properties III, LP Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Southwestern Retail Properties LP Attn: Allan Reagan 2000 S. IH-35, Suite Q11 Round Rock, TX 78681

Spectrum P.O. Box 60074 City of Industry, CA 91716-0074

UBS Real Estate Securities, Inc. c/o Berkadia Commercial Mortgage LLC 6955 Union Park Center, Suite 450 Midvale, UT 84047

U.S. Trustee 903 San Jacinto, Suite 230 Austin, TX 78701

Village @ La Orilla Attn: Philip Lindborg 12809 Donette Court N.E. Albuquerque, N< 87112

Wells Fargo Auto MAC T9017-026 P.O. Box 168-48 Irving, TX 75016-8048

Williamson County Tax Office 904 S. Main Street Georgetown, TX 78626

#### Parties Requesting Notice

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